

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

ALL CASES

MDL No. 3047

Case No. 4:22-md-03047-YGR

**NEW JERSEY ATTORNEY GENERAL
AND DIVISION OF CONSUMER
AFFAIRS' MOTION TO ENLARGE TIME
FOR STATE AGENCY SUBSTANTIAL
COMPLETION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Under Civil Local Rules 6-1 and 6-3, the Plaintiffs Matthew J. Platkin, Attorney General for the State of New Jersey, and Cari Fais, Director of the New Jersey Division of Consumer Affairs (hereinafter, the "New Jersey Plaintiffs") submit this Motion to Enlarge Time for State Agency Substantial Completion.

As discussed in the attached declaration, the New Jersey (1) Governor's Office, (2) Governor's Council on Mental Health Stigma, (3) Department of Children and Families, (4) Department of Education, (5) Department of Health, (6) Department of Human Services, (7) Department of the Treasury, and (8) Office of the Secretary of Higher Education (collectively, "New Jersey State Agencies") have all been working diligently to meet the February 7, 2025 substantial completion deadline. However, due to the large volume of documents, limited resources

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1 of the New Jersey State Agencies working on document review and production, and procurement
2 issues that unforeseeably delayed retention of a vendor to assist in the document review, they are
3 unable to meet that deadline. As a result, the New Jersey Plaintiffs are requesting an extension of
4 time to March 7, 2025 for substantial completion of production of state agency documents
5 requested pursuant to Rule 34.

6
7 Under Federal Rule of Civil Procedure 6, “[w]hen an act may or must be done within a
8 specified time, the court may, for good cause, extend the time ... with or without motion or notice
9 if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R.
10 Civ. P. 6(b)(1)(A). “Where good cause is shown, a request for an extension generally should be
11 granted in the absence of bad faith by the moving party or prejudice to the adverse party.” *Khokhar*
12 *v. Gov't of Pakistan through its Ministries*, 2017 WL 4552059, at *1 (N.D. Cal. Oct. 10, 2017)
13 (citing *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258-59 (9th Cir. 2010). Further, as the
14 Ninth Circuit has recognized, “[g]ood cause’ is a non-rigorous standard.” *Ahanchian*, 624 F.3d at
15 1259.

16 Here, there is good cause for the extension. As noted in the accompanying declaration, the
17 relevant New Jersey State Agencies have been working towards the February 7, 2025 substantial
18 completion deadline and are continuing to do so. Any prejudice to Meta that may result from this
19 request for an extension can be eliminated by a reciprocal extension of the deadline for Meta to
20 take New Jersey’s Rule 30(b)(6) deposition. As such, the New Jersey Plaintiffs respectfully request
21 an enlargement of time to March 7, 2025 for substantial completion of New Jersey State Agency
22 productions.

23 DATED: February 7, 2025

24
25 Respectfully submitted,

26 **MATTHEW J. PLATKIN**
27 Attorney General
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/s/ Thomas Huynh

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